

The Honorable Ricardo Martinez

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE**

UNITED STATES OF AMERICA, et  
al.,

Plaintiff,

v.

STATE OF WASHINGTON,

Defendant.

NO. C70-9213M  
Subproceeding No. 01-1

(CULVERTS)

DECLARATION OF LOU BAKER

I, Lou Baker, declare as follows:

1. I am the Roadway Operations Supervisor for the Washington State Department of Transportation ("WSDOT"). I have held this position or its equivalent for four years and I have worked for the WSDOT as a Transportation Planning Specialist for a total of eight years. In all, I have worked for WSDOT since 1989. My duties include updating and distributing the State Highway Log Planning Report, updating the Roadway Classification Log, Horizontal and Vertical alignment Report and Road Life (Contract History) Report. I also supervise field and office personnel. The statements in this declaration are based on my personal knowledge.

2. A centerline line measures the length of a highway and does not take into consideration the number of lanes. A one-mile length of four lanes measures the same as one-mile length of two lanes, etc. Both equal one centerline mile. A centerline mile is a linear measure of a State Route in 1/100<sup>th</sup> mile increments.

3. I have worked for 13 years updating the State Highway Log through contracts and field checks. The State Highway Log is a report which lists all State Routes from beginning to end in 1/100<sup>th</sup> mile increments and includes features on and along the route (number of lanes, roadway width, intersections, structures, traffic control, illumination, speed limit, special use lanes for example). A field check is physically inventorying a State Route, or section thereof, by driving the route in a vehicle equipped with a distance Measuring Instrument (DMI). A DMI is a highly calibrated odometer which is linked through a sensor to the transmission, which sends pulses to the DMI and the DMI reads out the mileage to 1/1000<sup>th</sup> of a mile (1/100<sup>th</sup> for WSDOT purposes). Contracts give lengths in engineering stations, which are 100 feet. I calculate the number of stations in the contract area and then convert the length in feet to length in miles.

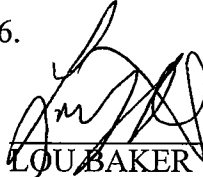
4. The following is a table containing the centerline miles of state highways from 1974 to present. Each year on the table is representative of the year on the State Highway Log cover, which until this year's publication (2005B) contained the totals of the prior year (i.e., 2003 Highway Log represented data thru 12/31/2002).

| Year           | Centerline Miles |
|----------------|------------------|
| 1974           | 6912             |
| 1975           | 6906             |
| 1976           | 6916             |
| 1977           | Unavailable      |
| 1978           | 6920             |
| 1979           | 6919             |
| 1980           | 6888             |
| 1981           | 6888             |
| 1982           | 6888             |
| 1983           | 6941             |
| 1984           | 6960             |
| 1985           | 6972             |
| 1986           | 6973             |
| 1987-89        | Unavailable      |
| 1990           | 6996             |
| 1991 (Pre RJT) | 6998             |

| Year           | Centerline Miles |
|----------------|------------------|
| 1991(Post RJT) | 7012             |
| 1992           | 7020             |
| 1993           | 7048             |
| 1994           | 7047             |
| 1995           | 7052             |
| 1996           | 7053             |
| 1997           | 7059             |
| 1998           | 7066             |
| 1999           | 7063             |
| 2000           | 7061             |
| 2001           | 7061             |
| 2002           | 7063             |
| 2003           | 7063             |
| 2004           | 7049             |
| 2005           | 7046             |
| 2005B          | 7046             |

I declare under penalty of perjury that the foregoing is true and correct.

Dated this 1<sup>st</sup> day of September, 2006.

  
LOU BAKER